

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NICHOLAS SATCHELL,

Plaintiff,

- against -

**THE CITY OF YONKERS and
P.O. JOHN DOE, Shield No. 526,
Individually and in his official capacity,**

Defendants.

07-CIV-9513 (NRB)

ECF

**PLAINTIFF'S FIRST SET
OF INTERROGATORIES**

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Pursuant to Rules 26, 33 and 34 of the Federal Rules of Civil Procedure and Local Rules 26.2 and 26.3 of this Court, Plaintiff Independent Asset Management LLC ("IAM") hereby requests that Defendant Daniel Zanger ("Zanger") serve upon the undersigned attorneys sworn written answers to each of the interrogatories set forth below within thirty days after service hereof.

INSTRUCTIONS

- A. If the answer to all or any part of an interrogatory is not presently known or available, include a statement to that effect and furnish any information currently known or available and a description of the source of information that was once known or available that could have been used to respond to the interrogatory.

- B. If any information called for by an interrogatory is withheld by reason of a claim of privilege, state with specificity the information as required by Local Rule 26.2.
- C. These interrogatories are continuing. If at any time after service of answers hereto, and prior to the trial of this action, Defendant obtains or becomes aware of additional information pertaining to any of these interrogatories, the disclosure of which may be required pursuant to Rule 26(e) of the Federal Rules, Defendant shall, within thirty days, and in no event later than five days before trial, serve upon the undersigned supplemental sworn written answers setting forth such additional information.

DEFINITIONS

In addition to the definitions contained in Rule 26.3 of the Local Civil Rules, the following definitions and instructions shall apply to each of the Interrogatories:

- A. "Defendants" means both the City of Yonkers and P.O. John Doe.
- B. "Educational Institution" means any school, college, university, or any other place of learning
- C. "Incident" means the subject matter, including all events leading up to and following, discussed in Plaintiff's Complaint.
- D. "Lawsuit" means include civil complaints, arbitration, mediations, as well as complaints filed by and investigations commenced by the Yonkers P.D. or any other governmental authority.

- E. "P.O. John Doe" means the police officer with Shield No. 526 of the Yonkers P.D.
- F. "Yonkers P.D." means the City of Yonkers Police Department.

INTERROGATORIES

1. Identify all persons having knowledge concerning the matters set forth below, and describe the substance of the knowledge possessed by such persons:
 - (a) the matters set forth in Plaintiff's Complaint;
 - (b) the averments in Defendants' Answer; and
 - (c) the topics addressed in Plaintiff's First Request for Production of Documents.
2. Identify all documents or physical evidence relating to the subject matter of the Complaint as well as Defendants' Answer.
3. Identify all persons who were present during the Incident, and describe the substance of each person's recollection of the events described in the Complaint.
4. Identify all persons with whom P.O. John Doe worked, served, patrolled, etc. while working for the Yonkers P.D.
5. Identify all prior lawsuits in which P.O. John Doe has been involved in any capacity or extent prior to the instant lawsuit.
6. Identify all lawsuits that have been filed against the City of Yonkers, the Yonkers P.D., and/or any past or present employee of the Yonkers P.D. within the last ten (10) years.

7. In connection with Interrogatory No. 6, discuss the subject matter and factual findings in each of those lawsuits.

Dated: New York, New York
January 18, 2008

Respectfully submitted,

By: /s/ Craig Stuart Lanza
Craig Stuart Lanza (CL-2452)
William S. Holleman*
BALESTRIERE PLLC
225 Broadway, Suite 2700
New York, NY 10007
Telephone: 212-374-5404
Email: clanza@balestriere.net
Attorneys for Plaintiff

* Admission pending to the New York State Bar.